



Wisconsin  
Right to Life, Inc.

**POLITICAL  
ACTION  
COMMITTEE**

Feb 71 3 55 PM '95

February 15, 1995

Mr. Donald Averett  
Senior Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, D. C. 20463

Dear Mr. Averett,

I received your communications yesterday where you ask for clarification on some points on three of our previously filed reports. This letter will clarify those points.

1. OCTOBER QUARTERLY REPORT (8/25/94 - 9/30/94)

On Detailed Summary Page, line 23 we should have put in \$1000 in column B. On lines 21, a and b, we should have put \$56.93. On line 24, we have corrected the total in column B, which also alters the amount on lines 30 and 31. That corrected amount is \$17313.71. The amended page is enclosed.

2. 12 DAY PRE-GENERAL REPORT (10/1/94- 10/19/94)

We made an addition mistake. The totals on Schedule D, pages 2 of 3 and 3 of 3 show the corrected amounts. Those corrected pages are included along with the corrected summary page with the corrected total of "debts and obligations owed by the committee." That new total is \$19605.55

3. 30 DAY POST-GENERAL REPORT (10/20/94- 11/28/94)

For this report and for the 12 day pre-general report (discussed above), you question expenditures made by the PAC to our parent organization, Wisconsin Right to Life, Inc. We are quite aware Wisconsin Right to Life, Inc. IS PROHIBITED from spending any money to influence elections. But the expenditures you question were made by the PAC. The PAC often PURCHASES items from WRL, Inc. such as GOTV lists, mailing lists, etc. and does so at fair market value. In addition, when the PAC uses resources in the WRL, Inc. office, THE PAC PAYS FOR SUCH USE. Examples would be using the copier or RENTING the telephone banks or individual phones for GOTV phone calling. Also, there are several individuals who work most of the year for WRL, Inc. but during election times, they will spend some of

their time working for the PAC. When that occurs, the PAC pays WRL, Inc. for the number of hours those individuals worked for the PAC. Then, the employee's salary check is issued by WRL Inc. and includes the time spent working for WRL, Inc and for the time spent working for the PAC. It is clear that none of the items you question are expenditures made by WRL, Inc. They were expenditures made by the PAC.

Sincerely,

*Susan Arnacost*

Susan Arnacost  
Assistant Treasurer

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

HO-2

Alan Kramer, Treasurer  
Wisconsin Right To Life  
Political Action Committee  
10625 W. North Avenue  
Milwaukee, WI 53226

FEB -8 1995

Identification Number: C00173278

Reference: October Quarterly Report (6/25/94-9/30/94)

Dear Mr. Kramer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The totals listed on Lines 21(b), 21(c), 23 and 24, Column B of the Detailed Summary Page appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Donald L. Averett  
Senior Reports Analyst  
Reports Analysis Division

# **DETAILED SUMMARY PAGE** **OF RECEIPTS AND DISBURSEMENTS** **PAGE 2, FEC FORM 3X**

*Amended*

(revised 1/1/91)

NAME OF COMMITTEE <b>Wisconsin Right to Life PAC</b>		REPORT COVERING PERIOD FROM <b>8/25</b> TO <b>9/30</b>	
		COLUMN A Total This Period	COLUMN B Calendar Year
<b>I. Receipts</b>			
11. Contributions (other than loans) From:			
a. Individual/Persons Other Than Political Committees:			
i. Itemized (use Schedule A)		<b>8483.00</b>	<b>29383.00</b>
ii. Unitemized		<b>0</b>	<b>0</b>
iii. Total (add i and ii) >		<b>8483.00</b>	<b>29383.00</b>
b. Political Party Committees		<b>0</b>	<b>0</b>
c. Other Political Committees (such as PACs)		<b>0</b>	<b>0</b>
d. Total Contributions (add a ii, b and c) >		<b>8483.00</b>	<b>29383.00</b>
12. Transfers From Affiliated/Other Party Committees		<b>0</b>	<b>0</b>
13. All Loans Received		<b>0</b>	<b>0</b>
14. Loan Repayments Received		<b>0</b>	<b>0</b>
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.)		<b>0</b>	<b>0</b>
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees		<b>0</b>	<b>0</b>
17. Other Federal Receipts (Dividends, Interest, etc.)		<b>0</b>	<b>0</b>
18. Transfers from Nonfederal Account for Joint Activity		<b>0</b>	<b>0</b>
19. Total Receipts (add 11d, 12, 13, 14, 15, 16, 17, and 18) >		<b>8483.00</b>	<b>29383.00</b>
20. Total Federal Receipts (subtract line 18 from line 19) >		<b>8483.00</b>	<b>29383.00</b>
<b>II. Disbursements</b>			
21. Operating Expenditures:			
a. Shared Federal/Non-Federal Activity (from Schedule H4):			
i. Federal Share		<b>0</b>	<b>0</b>
ii. Non-Federal Share		<b>0</b>	<b>0</b>
b. Other Federal Operating Expenditures		<b>0</b>	<b>56.93</b>
c. Total Operating Expenditures (add a i, a ii, and b) >		<b>0</b>	<b>56.93</b>
22. Transfers to Affiliated/Other Party Committees		<b>0</b>	<b>0</b>
23. Contributions to Federal Candidates/Committees and Other Political Committees		<b>0</b>	<b>0</b>
24. Independent Expenditures (use Schedule E)		<b>4320</b>	<b>16256.78</b>
25. Coordinated Expenditures Made by Party Committees (2 U.S.C. 441a(d)) (use Schedule F)		<b>0</b>	<b>0</b>
26. Loan Repayments Made		<b>0</b>	<b>0</b>
27. Loans Made		<b>0</b>	<b>0</b>
28. Refunds of Contributions To:			
a. Individuals/Persons Other Than Political Committees		<b>0</b>	<b>0</b>
b. Political Party Committees		<b>0</b>	<b>0</b>
c. Other Political Committees (such as PACs)		<b>0</b>	<b>0</b>
d. Total Contribution Refunds (add a, b and c) >		<b>0</b>	<b>0</b>
29. Other Disbursements		<b>4320</b>	<b>17313.71</b>
30. Total Disbursements (add 21c, 22, 23, 24, 25, 26, 27, 28d, and 29) >		<b>4320</b>	<b>17313.71</b>
31. Total Federal Disbursements (subtract line 21 a ii from line 30) >		<b>4320</b>	<b>17313.71</b>
<b>III. Net Contributions/Operating Expenditures</b>			
32. Total Contributions (other than loans)(from line 11d)		<b>8483</b>	<b>29383.00</b>
33. Total Contribution Refunds (from line 28d)		<b>0</b>	<b>0</b>
34. Net Contributions (other than loans)(subtract line 33 from line 32)		<b>8483</b>	<b>29383.00</b>
35. Total Federal Operating Expenditures (add 21 a i and 21 b) >		<b>0</b>	<b>56.93</b>
36. Offsets to Operating Expenditures (from line 15)		<b>0</b>	<b>0</b>
37. Net Operating Expenditures (subtract line 35 from line 36) >		<b>0</b>	<b>56.93</b>

**Federal Election Commission**  
**ENVELOPE REPLACEMENT PAGE**  
**FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

☐ Hand Delivered

DATE OF RECEIPT

☒ First Class Mail

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*2-15-95*

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☐ Received from the Senate Office of Public  
Records

DATE OF RECEIPT

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*JMH*  
PREPARER

*2-21-95*  
DATE PREPARED